

1 Joel E. Tasca  
 Nevada Bar No. 14124  
 2 Andrew S. Clark  
 Nevada Bar No. 14854  
 3 BALLARD SPAHR LLP  
 1980 Festival Plaza Drive, Suite 900  
 4 Las Vegas, Nevada 89135  
 Telephone: 702.471.7000  
 5 Facsimile: 702.471.7070  
 tasca@ballardspahr.com  
 6 clarkas@ballardspahr.com

7 *Attorney for Defendant Rausch Sturm LLP*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 GINA MANSOURI,

11 Plaintiff,

12 v.

13 RAUSCH STURM, LLP,

14 Defendants.  
 15

CASE NO. 2:22-cv-01529-CDS-NJK

**UNOPPOSED MOTION AND  
 PROPOSED ORDER TO EXTEND TIME  
 TO RESPOND TO COMPLAINT**

**(First Request)**

16 The response of defendant Rausch Sturm, LLP to plaintiff Gina Mansouri's  
 17 complaint (ECF No. 1) is due October 6, 2022. Rausch Sturm has requested, and  
 18 plaintiff has agreed, that Rausch Sturm have up to and including October 20, 2022,  
 19 to respond to plaintiff's complaint to provide additional time for Rausch Sturm to  
 20 investigate plaintiff's allegations and for Rausch Sturm to prepare a response.

21 Although Ms. Mansouri's counsel consented to the extension, counsel for  
 22 Rausch Sturm was unable to reach opposing counsel in time to authorize a  
 23 stipulation and proposed order, which is why this request is styled, instead, as an  
 24 unopposed motion. However, counsel for Rausch Sturm represents that plaintiff's  
 25 counsel does not intend to oppose this request. *See* Exhibit A, Email between  
 26 Counsel. Rausch Sturm asserts that there is good cause under Fed. R. Civ. P. 6(b)(1)  
 27 to extend this deadline, given, given that Rausch Sturm was very recently retained  
 28

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 702.471.7000 FAX 702.471.7070

1 and intends to discuss whether an early resolution to this case is possible.

2 This is the first request for an extension, and it is made in good faith and not  
3 for purposes of delay.

4  
5 Dated: October 6, 2022

6 BALLARD SPAHR LLP

7  
8 By: /s/ Andrew S. Clark

9 Joel E. Tasca, Esq.

10 Nevada Bar No. 14124

11 Andrew S. Clark

12 Nevada Bar No. 14854

13 1980 Festival Plaza Drive, Suite 900

14 Las Vegas, Nevada 89135

15 *Attorneys for Defendant*  
16 *Rausch Sturm LLP*

17  
18  
19 **ORDER**

20 IT IS SO ORDERED:

21  
22   
UNITED STATES MAGISTRATE JUDGE

23 DATED: October 11, 2022  
24  
25  
26  
27  
28

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